

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

In re Application of Daniel Snyder
for an Order Directing Discovery from Mary
Ellen Blair and Comstock Holding Companies,
Inc. Pursuant to 28 U.S.C. § 1782

Misc. Action No. 1:20-mc-00023-LO-TCB

***Ex Parte* Petition for Assistance in Aid of
a Foreign Proceeding Pursuant to
28 U.S.C. § 1782**

MOTION TO WITHDRAW AS COUNSEL FOR PETITIONER

In connection with this *ex parte* petition seeking third-party discovery, Comstock Holding Companies, Inc. (“Comstock”) has asserted a conflict of interest, arising out of wholly unrelated work performed by Reed Smith LLP attorneys wholly uninvolved in this matter, and has declined to waive such alleged conflict, demanding that Reed Smith LLP withdraw from representing Daniel Snyder (“Petitioner” or “Mr. Snyder”) in connection with this petition with regard to Comstock. Comstock has also demanded that Reed Smith LLP withdraw from representing Petitioner in connection with this petition with regard to Mary Ellen Blair – an individual that Reed Smith LLP has never represented – asserting that continuing in this proceeding with regard to Mary Ellen Blair would also create a conflict.

Without stipulating that any conflict exists with regard to any party, for purposes of this proceeding or otherwise, to avoid any risk of distraction or delay to Petitioner’s simple discovery demands, Reed Smith LLP hereby moves for entry of an Order, pursuant to Local Civil Rule 83.1(G), approving its withdrawal as counsel for Petitioner in the instant proceeding.

Petitioner has been provided with reasonable notice of this motion. Petitioner will continue to be represented in connection with the petition by Tacopina, Seigel & DeOreo, and Petitioner will promptly retain local counsel.

Dated: August 20, 2020
McLean, Virginia

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(Admission Pro Hac Vice Pending)

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